

**EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

BLACK SIX LLC

Plaintiff(s),

v.

ALL AMERICAN REFINERY, INC., ISLAND L.P. GAS  
SERVICES, INC., DBA PROPANE MAN, and JESSE  
GRANTHAM

Defendant(s).

Civil Case No.: 1:24-cv-21285-KMW

**AFFIDAVIT OF ROBERT GARSON IN  
SUPPORT OF PLAINTIFF'S VERIFIED  
MOTION FOR ATTORNEY'S FEES AND  
COSTS**


STATE OF FLORIDA                     )  
  )  
SOUTHERN DISTRICT                 )

On this day personally appeared before me, the undersigned authority, Robert Garson ("Affiant") who after being first duly sworn, deposes and says:

1. I have personal knowledge of the facts set forth herein.
2. I am an attorney duly authorized to practice law in the State of Florida as well as several other jurisdictions. Specifically, I have been engaged in the practice of law since 1999 and am admitted to practice in England & Wales since 1999; New York since 2010; Florida since 2022, and the District of Columbia since 2022. I am a Barrister-Attorney with full active practicing certificates in all the foregoing jurisdictions.

3. I am a partner with the law firm of GS2 Law PLLC, which has offices in New York and Florida.
4. GS2 Law PLLC was engaged by the Plaintiff to prosecute this action.
5. The billing rate for the work performed on this matter by me is \$750 per hour. I spent 8.50 hours in pursuing Plaintiff's claims in this action, for a total of \$6,375.00 in attorney's fees.
6. Yanina Zilberman is a senior associate attorney with GS2 Law PLLC and has been duly authorized to practice law in the State of Florida since 2013. The billing rate for the work performed on this matter by Yanina Zilberman is \$400.00 per hour. Ms. Zilberman spent 0.90 hours in pursuing Plaintiff's claims in this action for a total of \$360.00 in attorney's fees.
7. Natalia Jimenez is our team paralegal. The billing rate for the work performed on this matter by Natalia Jimenez is \$225.00 per hour. Ms. Jimenez spent 8.80 in pursuing Plaintiff's claims in this action for a total of \$1,980.00 in fees.
8. Plaintiff has incurred a total of \$1,382.26 in costs in connection with this action.
9. Description of the specific attorney work performed and costs incurred in the prosecution of this action are set forth in the time summary attached hereto as Composite **Exhibit 1**.
10. The hours worked by GS2 Law PLLC attorneys are recorded in time records kept by the firm in the ordinary course of business, and they are an accurate record of the time expended by the firm.

11. The aforementioned fees and costs were reasonable and necessarily incurred in connection with the firm's representation of Plaintiff and were in accordance with applicable legal standards.


  
Robert Garson  
Date:

SWORN TO AND SUBSCRIBED before me by means of ☒ physical presence or ☐ online notarization, this 8th day of July, 2024, by Robert Garson. He/she is personally known to me or has produced \_\_\_\_\_ as identification.

[NOTARY SEAL]



Yanina Zilberman  
Comm. #HH077861  
Expires: Jan. 6, 2025  
Bonded Thru Aaron Notary

  
Notary Public  
Notary Name: Yanina Zilberman  
My Commission expires: 1/6/2025

## Activities Export

## EXHIBIT 1

07/08/2024  
4:28 PM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/26/2024	①	Email exchange with process servers to serve Companies + Jesse Grantham ● Billed invoice 4065	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.20h	\$225.00	-	\$45.00
04/26/2024	①	Review and file Proofs of Service for Jesse Grantham, All American Refinery and Island LP Gas Services Inc dba Propane Man ● Billed invoice 4065	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.10h	\$225.00	-	\$22.50
04/30/2024	①	Receipt, review and calendar paperless order ● Billed invoice 4065	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.20h	\$225.00	-	\$45.00
05/09/2024	①	Draft and Efile Notice of Filing Exhibits and Exhibits ● Billed invoice 4182	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.90h	\$225.00	-	\$202.50
05/17/2024	①	Finalize and file Statement of Citizenship ● Billed invoice 4182	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.20h	\$225.00	-	\$45.00
05/01/2024	①	eFiled the Affidavits of Service ● Billed invoice 4182	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.20h	\$225.00	-	\$45.00
05/01/2024	①	Research regarding service upon: -Grantham in Mississippi -All American Refinery in Mississippi ● Billed invoice 4182	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	0.40h	\$225.00	-	\$90.00
06/06/2024	①	Drafting of Plaintiff's motion for	01226- BlackSix LLC-	Natalia	0.70h	\$225.00	-	\$157.50
					18.20h	\$0.00	\$0.00h	\$8,715.00

## Activities Export

07/08/2024  
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		final default judgment	Grantham Recovery	Jimenez				
		● Draft invoice 4525	Grantham Recovery					
06/07/2024	①	Finalized drafting of Motion for entry of default judgment against defendants	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.50h	\$225.00	-	\$112.50
		● Draft invoice 4525						
07/03/2024	①	Draft and Revise Plaintiff's Motion for Entry of Default Judgment Against The Defendants	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	1.60h	\$225.00	-	\$360.00
		● Unbilled						
07/05/2024	①	Continue Drafting Exhibits to Motion for Default Judgment	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	1.20h	\$225.00	-	\$270.00
		● Unbilled						
07/03/2024	①	Draft of Declaration of Default Judgment; Draft of Exhibit B and C to Motion for Default Judgment	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.80h	\$225.00	-	\$180.00
		● Unbilled						
07/05/2024	①	Draft Affidavit A Attorneys Fees and Costs	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.40h	\$225.00	-	\$90.00
		● Unbilled						
07/08/2024	①	Finalize Affidavit on Motion for Attorney's fees	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.30h	\$225.00	-	\$67.50
		● Unbilled						
07/08/2024	①	Updating and correcting DECLARATION OF OLIVER PARSONS IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.90h	\$225.00	-	\$202.50

18.20h

\$0.00 \$8,715.00  
0.00h 18.20h

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## Activities Export

07/08/2024  
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
JUDGMENT AGAINST THE DEFENDANTS								
		Unbilled						
07/08/2024	U	Communication by email with Oliver Parsons to send his declaration for his review	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.10h	\$225.00	-	\$22.50
		Unbilled						
07/08/2024	U	Last changes on Oliver Parson's declaration	01226- BlackSix LLC- Grantham Recovery	Natalia Jimenez	0.10h	\$225.00	-	\$22.50
		Unbilled						
03/27/2024	U	Research and drafting complaint.	01226- BlackSix LLC- Grantham Recovery	Robert Garson	2.80h	\$750.00	-	\$2,100.00
		Billed invoice 3811						
03/28/2024	U	Drafting complaint and email to client.	01226- BlackSix LLC- Grantham Recovery	Robert Garson	3.30h	\$750.00	-	\$2,475.00
		Billed invoice 3811						
04/05/2024	U	Filing complaint, exhibits and drafting summonses and Civ Cover sheet	01226- BlackSix LLC- Grantham Recovery	Robert Garson	1.00h	\$750.00	-	\$750.00
		Billed invoice 4065						
05/07/2024	U	Review of docket and corrections to filings made.	01226- BlackSix LLC- Grantham Recovery	Robert Garson	0.30h	\$750.00	-	\$225.00
		Billed invoice 4182						
05/03/2024	U	Review of Neon Century report for failed service points.	01226- BlackSix LLC- Grantham Recovery	Robert Garson	0.30h	\$750.00	-	\$225.00
		Billed invoice 4182						
06/04/2024	U	Default in 1:24-cv-21285-KMW -	01226- BlackSix LLC-	Robert	0.20h	\$750.00	-	\$150.00
					18.20h		\$0.00	\$8,715.00
							0.00h	18.20h

## Activities Export

07/08/2024  
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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		email re default	Grantham Recovery	Garson				
		Draft invoice 4525	Grantham Recovery					
06/05/2024	①	Review court order and email instructions	01226- BlackSix LLC- Grantham Recovery	Robert Garson	0.20h	\$750.00	-	\$150.00
		Draft invoice 4525	Grantham Recovery					
07/08/2024	①	Review and Finalize Motion and all supporting documents	01226- BlackSix LLC- Grantham Recovery	Robert Garson	0.40h	\$750.00	-	\$300.00
		Unbilled	Grantham Recovery					
04/30/2024	①	Draft and Prepare Citizenship Disclosure Statement - Diversity Cases FRCP 7.1(2); E-mail to Client to confirm he is sole member	01226- BlackSix LLC- Grantham Recovery	Yanina Zilberman	0.70h	\$400.00	-	\$280.00
		Billed invoice 4065						
06/04/2024	①	Review and analyze court procedures regarding default in preparation of default documents	01226- BlackSix LLC- Grantham Recovery	Yanina Zilberman	0.20h	\$400.00	-	\$80.00
		Draft invoice 4525	Grantham Recovery					
						18.20h	\$0.00 0.00h	\$8,715.00 18.20h

# Activities Export

07/08/2024  
9:56 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/28/2024		4/22/2024 \$104.94 Black Six LLC vs All American Refinery Inc 4/22/2024 \$136.74 Service of Process, Not Served, Jesse Grantham, 401 Broadway Dr 17179878.100 \$104.94 Black Six LLC vs All American Refinery Inc \$136.74 Service of Process, Served, ISLAND L.P.GAS SERVICES, INC., 17179881.100 DBA PROPANE MAN., 401 Broadway Dr 4/22/2024 \$104.94 2:20-cv-09521 FLA-E \$136.74 Service of Process, Served, Greer, Burns & Crain, LTD, 300 S 17194769.100 Wacker Dr, Ste 2500 4/23/2024 \$104.94 Black Six LLC vs All American Refinery Inc \$136.74 Service of Process, Not Served, ISLAND L.P.GAS SERVICES, 17195910.100 INC., DBA PROPANE MAN, 94-171 Leonui St 4/23/2024 \$104.94 2:20-cv-09521 FLA-E \$136.74 Service of Process, Not Served, Laura Wanek, Esq., 300 S	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Natalia Jimenez	1.00	\$976.26	-	\$976.26

\$0.00 \$1,382.26  
0.00h 0.00h



Activities Export

07/08/2024  
9:56 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Wacker 17209467.100 Dr, Ste 2500 4/24/2024 \$104.94 Black Six LLC vs All American Refinery Inc \$136.74 Service of Process, Served, All American Refinery, 3820 Orleans 17209851.100 Ave Ste 201 4/24/2024 \$104.94 Black Six LLC vs All American Refinery Inc \$136.74 Service of Process, Served, Jesse Grantham, 3820 Orleans Ave 17209854.100 Ste 201						
		Billed invoice 4182						
04/08/2024	-	Billed invoice 4065	01226- BlackSix LLC- Grantham Recovery Grantham Recovery	Robert Garson	1.00	\$406.00	-	\$406.00
							\$0.00	\$1,382.26
							0.00h	0.00h